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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)
)
Amendment of Sections 73.21 and 73.37 of) RM-11136
the Commission's Rules to Provide for)
Facilities Changes by Stations Operating in the)
Expanded AM Band (1605-1705 kHz))

To: The Office of the Secretary

**COMMENTS OF CLEAR CHANNEL COMMUNICATIONS, INC.
IN SUPPORT OF PETITION FOR RULE MAKING**

Pursuant to the Commission's *Public Notice* of January 5, 2005,¹ Clear Channel Communications, Inc. ("Clear Channel") hereby submits its comments in support of the captioned Petition for Rulemaking (the "Petition") filed on October 25, 2004 (and supplemented on December 15, 2004) by Intermart Broadcasting Corporation of Georgia, Inc., Rama Communications, Inc., and Multicultural Radio Broadcasting, Inc. The Petition requests the Commission to undertake a rulemaking proceeding to amend certain of its AM technical rules as they relate to stations authorized in the AM expanded band (1605-1705 kHz). In general, the Petition seeks rule changes that would allow expanded band stations to increase power up to the full 50 kW maximum permitted for Class B stations in the standard AM band, and to undertake facilities modifications (including the use of directional arrays) on a par with standard band stations.

As the holder of authorizations for four AM expanded band stations, Clear Channel supports the Petition. Clear Channel agrees with the petitioners, as pointed out in their December 15, 2004, supplement, that the significantly lower ground conductivity in the

¹ *Public Notice*, "Consumer & Governmental Affairs Bureau, Reference Information Center, Petitions for Rulemaking Filed," Report No. 2686 (Jan. 5, 2005).

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expanded band makes it far more difficult for stations there, as opposed to stations in the lower portion of the AM band, to generate a quality signal at the currently authorized 10 kW for expanded band stations. Allowing all expanded band stations to employ the same 50 kW maximum power permitted to Class B stations in the standard band would ameliorate the present disparity between standard and expanded band stations and allow expanded band stations to serve substantial additional numbers of listeners.

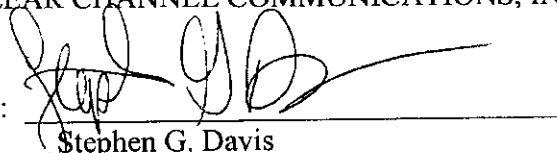
Clear Channel also agrees that there is no logical reason for expanded band stations to lack the same flexibility that standard band stations enjoy to undertake facility modifications, including site changes, community of license changes (where consistent with Section 307(b) of the Act), power increases to the maximum 50 kW permitted for standard band Class B stations, and the use of directional arrays. The current AM allocation standards should operate just as effectively to prevent destructive interference in the expanded band context as they do with respect to stations in the standard band, and Clear Channel sees no reason why those standards cannot be applied across all portions of the AM band. Once again, allowing expanded band stations the same technical flexibility as standard band stations possess will obviate the current disparate treatment of two categories of AM stations, and will allow expanded band stations similarly to implement technical improvements that serve the public interest.

Accordingly, Clear Channel supports the Petition and urges the Commission to commence a proceeding to amend the AM expanded band rules consistent with the Petition's suggestions.

Respectfully submitted,

CLEAR CHANNEL COMMUNICATIONS, INC.

By:

A handwritten signature in black ink, appearing to read 'Stephen G. Davis', is written over a horizontal line.

Stephen G. Davis
Senior Vice President of Engineering
and Capital Management

2625 S. Memorial Drive
Tulsa, OK 74129
(918) 664-4581

February 4, 2005

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Comments of Clear Channel Communications, Inc. in Support of Petition for Rule Making" were sent this 4th day of February, 2005, via first-class postage prepaid mail, to the following:

Lauren A. Colby, Esq.
Law Office of Lauren A. Colby
10 East Fourth Street
P.O. Box 113
Frederick, MD 21705-0113

John C. Trent, Esq.
Putbrese Hunsaker & Trent, PC
200 South Church Street
Woodstock, VA 22664


Claudia L. Cartagena